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January 10, 2007

By Facsimile (212) 805-6304

Hon. Paul A. Crotty
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 735
New York, New York 10007-1581

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Re: **Naftomar Shipping and Trading v. D&C Enterprises (Pvt) Ltd.**
Docket #: 07 CV 8445 (PAC)
Our Ref: 07-1231

Dear Judge Crotty:

We are attorneys for the Plaintiff in this admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure. We write to provide the Court with a status update in the above captioned matter and to request that Plaintiff be allowed to file a second Amended Complaint adding two new defendants to the action.

Plaintiff initiated this action on September 28, 2007 by filing a Complaint. On October 3, 2007 an Ex Parte Order authorizing process of maritime attachment was issued permitting restraint of Defendant's property in the hands of garnishee banks located within the Southern District of New York. On November 9, 2007, the Complaint was amended to correct the name of the Defendant, which was inadvertently spelled "LAUFGS" in the original Complaint instead of the proper "LAUGFS."

The Defendant has not appeared and, despite daily service of the Writ of Attachment on the garnishee banks, none of Defendant's property has been restrained in the district.

Since the issuance of the Amended Order, our client has conducted additional research into how the primary Defendant, D&C, is moving its property so as to avoid the Ex-Parte Order of Attachment. As a result, the client has informed us that there are two additional companies, Gas Auto Lanka (Pvt) Ltd. and Laugfs Holdings Ltd., which are alter-egos of the Defendant D&C.

As stated in the proposed Second Amended Complaint, D&C, Gas Auto Lanka and Laugfs Holdings should be considered as a single economic unit with no corporate distinction between or among them, rendering each other liable for the debts of the other, and all assets of Gas Auto and Laugfs Holding susceptible to attachment and/or restraint for the debts of D&C.

MEMO ENDORSED

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Thus, Plaintiff would like to add these companies to the Complaint and the attachment order such that Plaintiff may have a greater chance of obtaining security on its claim and jurisdiction over the Defendant(s).

✓ In light of the foregoing, we respectfully request that this letter be memo-endorsed by your Honor, providing that Plaintiff is permitted to file a second Amended Complaint, adding the two new defendants to the action. Please find attached for your review the proposed Amended Complaint.

Should your Honor have any questions or comments we are available to discuss the same at any convenient time to the Court. We thank your Honor for consideration of this request.

Respectfully Submitted,

Nancy R. Siegel
Nancy R. Siegel

✓ SO ORDERED: 1/11/08
Paula Crotty

HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE